

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

IN RE:	§	
Remarkable Healthcare LLC and	§	Case No. 24-40611
Remarkable Healthcare of Seguin LP	§	(Jointly Administered)
	§	
Debtor(s).	§	

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**GUADALUPE NH DEVELOPMENT, LTD.'S JOINDER WITH  
OBJECTION OF KRS SEGUIN LLC TO CONFIRMATION OF PLAN  
(RE: DOCKET NO. 75)**

**TO THE HONORABLE BRENDA T. RHOADES, U.S. BANKRUPTCY JUDGE:**

GUADALUPE NH DEVELOPMENT, LTD. (“Guadalupe”), files this Joinder regarding the *Objection of KRS Seguin, LLC to Confirmation of Plan (Re: Docket No. 38)* (Docket No. 75) (the “Objection”) filed herein on October 28, 2024 by KRS Seguin, LLC.

1. Guadalupe joins KRS Seguin, LLC in the relief requested in the Objection.
2. Guadalupe objects to confirmation of the Plan and assumption of the Seguin lease.
3. The Plan fails to address the cure obligation from the 2018-2019 case.
4. The cure note from the 2019 case, attached to the Guadalupe and already admitted as an exhibit in these cases, expressly states that the obligation constitutes a rent obligation of the Seguin lease.
5. Debtor has wild, baseless theories about the identity of the holder of the obligation, and Debtor ignores, *inter alia* the prior plan, the note, and Code §365(b)(1)(B).

WHEREFORE, GUADALUPE NH DEVELOPMENT, LTD respectfully request that the Court deny confirmation of the plan and assumption of the Seguin lease. Guadalupe respectfully requests such other and further relief to which they are entitled at law or in equity.

Dated: November 15, 2024

Respectfully submitted:

**WEYCER, KAPLAN, PULASKI & ZUBER, P.C.**

By: /s/ Jeff Carruth  
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**ATTORNEYS FOR:  
GUADALUPE NH DEVELOPMENT, LTD**

**CERTIFICATE OF SERVICE**

On November 15, 2024, I hereby certify that a true and correct copy of the foregoing item was served upon all registered ECF users who have appeared in this case to date through the ECF noticing system.

/s/ Jeff Carruth  
JEFF CARRUTH